STIPULATION 4:25-cv-03140- JSW and related cases

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1	On April 25, 2025, the Court set a hearing on the motions for preliminary injunction for May 13,
2	2025, and a briefing schedule that required Defendants' supplemental opposition to be filed by 2:00 p.m.
3	on May 6, 2025, and Plaintiffs' replies to be filed by May 9, 2025. See, e.g., Dkt. No. 24. Plaintiffs and
4	Defendants have conferred and respectfully request the Court to grant an extension of time for
5	Defendants' supplemental opposition to Plaintiffs' motions for preliminary injunction, and set the due
6	date for Defendants' opposition to May 7, 2025, at 5:00 p.m. The parties make this request because
7	Defendants need additional time to obtain additional information that may be useful to Plaintiffs' request
8	for injunctive relief.
9	For He v. Noem, No. 4:25-cv-3480-JSW, the parties request that the Court set the due date for
10	their joint status report to May 7, 2025. The parties respectfully request that the Court grant their
11	stipulation.
12	
13	Dated: May 6, 2025 Respectfully submitted, <sup>1</sup>
14	PATRICK D. ROBBINS Acting United States Attorney
15	Acting Officed States Attorney
16	s/ Elizabeth D. Kurlan
17	ELIZABETH D. KURLAN Assistant United States Attorney
18	Attorneys for Defendants
19	
20	
21	Dated: May 6, 2025  s/John Nicholas Sinodis
22	JOHN NICHOLAS SINODIS Van Der Hout, LLP
1	

Attorney for Plaintiffs

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 $<sup>^{1}</sup>$  In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all signatories listed herein concur in the filing of this document.

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1	<u>s/ Andre Y. Bates</u> ANDRE Y. BATES
2	DeHeng Law Offices PC
3	Attorney for Plaintiffs
4	
5	s/ Jesse M. Bless
6	JESSE M. BLESS Bless Litigation
7	Attorney for Plaintiffs
8	Thorney for 1 tunings
9	
	<u>s/ Brad Banias</u> BRAD BANIAS
10	Banias Law
11	Attorney for Plaintiffs
12	
13	a / Pau I ayaway
14	<u>s/ Ben Loveman</u> BEN LOVEMAN
15	Reeves Immigration Law Group
16	Attorney for Plaintiff
17	
18	<u>s/ Zachary R. New</u> ZACHARY R. NEW
19	Joseph and Hall P.C.
20	Attorney for Plaintiff
21	
22	[PROPOSED] ORDER
23	Pursuant to the parties' stipulation, IT IS SO ORDERED. Defendants will file their supplemental
24	opposition to Plaintiffs' motion for preliminary injunction by May 7, 2025, at 5:00 p.m.
25	
26	Date:
27	JEFFREY S. WHITE
28	United States District Judge
20	STIPULATION
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